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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|------------------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA, |) | CIVIL CASE NO. 20-02013 VC |
| Plaintiff, |) | |
| v. |) | SPECIAL AGENT ROAHN WYNAR'S |
| |) | DECLARATION IN SUPPORT OF THE |
| ONE PARCEL OF REAL ESTATE |) | GOVERNMENT'S RESPONSE TO |
| PROPERTY LOCATED AT 9414 PLAZA |) | DEFENDANT'S MOTION TO PRESERVE |
| POINT DRIVE, MISSOURI CITY, TEXAS, |) | EVIDENCE |
| 77459, |) | |
| Defendant. |) | |

I, Roahn Wynar, Special Agent for the Federal Bureau of Investigation ("FBI"), United States Department of Justice, state as follows:

1. I have been employed as a Special Agent with the FBI since February 2003. I am currently assigned to the FBI's San Francisco Field Office. As part of my training, I have received specific instruction in the execution of search warrants, Fourth Amendment search and seizure law, and investigative techniques. I have conducted investigations involving various criminal statutes, including,

1 in relevant part, Title 18, United States Code, Section 1343 (wire fraud); Title 18, United States Code,
2 Section 1956 (laundering of monetary instruments); and other related offenses.

3 2. I make this affidavit in support of the United States' opposition to Claimant Rowland
4 Marcus Andrade's motion to preserve evidence and store it with the Court during the pendency of this
5 action. See Dkt. No. 31.

6 3. I am among the lead agents investigating this case for the FBI. As part of my duties on
7 this particular case, I have reviewed evidence; participated in the execution of search and seizure warrants;
8 analyzed data relevant to the investigation; interviewed witnesses; and have communicated with other law
9 enforcement agents, including FBI agents and special agents with the Internal Revenue Service – Criminal
10 Investigations Division, about this case. Accordingly, my knowledge of this case includes my own
11 experience as well as facts relayed to me by others.

12 4. Although I was not present at the execution of the search warrant at the NAC business
13 office on September 13, 2018, information about the execution of the warrant has been relayed to me by
14 agents who were present. To my knowledge, at no time during the search of the NAC business office on
15 September 13, 2018, did any law enforcement officer conducting the search physically damage Claimant's
16 computer screen. Moreover, to my knowledge, no law enforcement officer attempted to log in or
17 otherwise access any electronic devices belonging to Claimant. The only aspect of Claimant's computer
18 that was copied and subsequently searched was the hard drive and its contents, which occurred after
19 Claimant's computer was shipped to the Silicon Valley Regional Computer Forensics Laboratory.

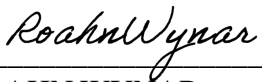
20 5. I am familiar with the contents of Claimant's hard drive. To date, I am unaware of any
21 selection of audio files on Claimant's computer that captures conversations he had on his office telephone
22 with Jack Abramoff, Japeth Dillman, or any other associates or purchasers of AML Bitcoin.

23 6. At no time before, during, or after the search did I communicate with any owner, manager,
24 or employee of the entity known as The Office Squad concerning the transcription of Claimant's phone
25 calls from telephone to digital files. Based on my experience and knowledge of this case, I believe that
26 The Office Squad is a clerical services business located in the office building where the NAC business
27 office is located. I believe that their services extend mostly to clerical work, such as forwarding mail and
28

1 assisting with setting up telephones, as well as managing the physical space rented by the NAC. I have
2 not witnessed The Office Squad demonstrate any expertise in transcription of audio files or the recording
3 of live telephone calls.

4 I declare under penalty of perjury that the foregoing is true and correct.

5
6 Dated: June 23, 2020



ROAHN WYNAR
Special Agent
Federal Bureau of Investigation